

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23
)	

**REPLY OF THE AMERICAN PUBLIC COMMUNICATIONS COUNCIL, INC.
TO OPPOSITIONS TO PETITION FOR PARTIAL RECONSIDERATION**

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SUMMARY

APCC's Petition for Reconsideration proceeds from three basic uncontested factual propositions. Payphones serve low income people. Payphones are at the margin of profitability. Payphones are on the verge of disappearing. According to the Commission, there will be millions of low income Americans who will be without basic voice service even if the Commission's Lifeline program achieves all its stated goals. Payphones have played and can continue to play a critical role in providing service to these groups. Although APCC's original petition was framed in terms of Lifeline support for payphone line service, APCC seeks to have the Commission initiate a rulemaking in which all the options for providing support for these payphone lines that serve low income consumers can receive appropriate support.

The oppositions raise only two arguments that merit any comment. They are simply wrong when they say a majority of residential customers must have subscribed to a service for it to be eligible for coverage. The correct reading of Section 254(c)(1) is that a service meeting all the criteria in that subsection must be covered by universal service but the Commission has discretion to include other services. In any event, the Commission can forbear on its own motion from applying Section 254(c)(1) and should do so here.

In a rulemaking, the Commission could determine the appropriate classification for payphone providers to qualify payphone lines for universal support. The issue is not the classification of the service or the provider, but whether universal support should be available to a service serving virtually serving only, and filling a gap in service for, low income consumers.

Attempting to bring the support of payphones under the rubric of public interest payphones is not viable. Section 276(b)(2) was designed to address the limited circumstances

where there is a market failure. It is not efficient for either payphone providers or regulators as a vehicle for the broad support of payphones.

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**REPLY OF THE AMERICAN PUBLIC COMMUNICATIONS COUNCIL, INC.
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The American Public Communications Council (“APCC”) hereby replies to the Oppositions¹ filed in response to APCC’s Petition for Reconsideration (“APCC Recon”).²

¹ Oppositions were filed by four parties: Comments of the National Association of State Utility Consumer Advocates On Petitions for Reconsideration (“NASUCA Opp”); Comments on Petitions for Reconsideration of Sprint Nextel Corporation (“Sprint Opp”); Opposition of the United States Telecom Association (“USTA Opp”), and Opposition of Verizon (“Verizon Opp”).

² The APCC Petition for Reconsideration seeks reconsideration of the Commission’s denial in its *Lifeline Order, Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, *Lifeline and Link Up*, WC Docket No. 03-109, *Federal-State Joint Board on Universal Service*, WC Docket No. 96-45, *Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 12-23, FCC 12-11, at Section XII, 166-67, ¶¶ 392-398 (Adopted January 31, 2012, Released February 6, 2012), of APCC’s *Petition for Rulemaking to Provide Lifeline Support to Payphone Line Service* (filed December 6, 2010)(“*Payphone Line Support Rulemaking Petition*”) and of APCC’s *Emergency Petition for Interim Relief to Prevent the Disappearance of Payphones*, (filed December 6, 2010)(“*Emergency Interim Relief Petition*”). Collectively, the three petitions—the *APCC Recon*, the *Payphone Line Support Rulemaking Petition*, and the *Emergency Interim Relief Petition*—are referred to as the APCC Petitions.

INTRODUCTION

The APCC Petitions proceed from a simple set of basic facts. Payphones now serve low income people, and indeed for all practical purposes, only low income people.³ Payphones are at the margin of profitability.⁴ They are on the verge of disappearing.⁵

The issue raised by the APCC Petitions is straight-forward: whether as part of the program mandated by Congress of attempting to foster universal service, and service to low

³ No party seriously disputes at all that payphones serve low income people. It is not someone with a working mobile phone in their pocket or purse or on their hip who uses a payphone, as APCC has repeatedly pointed out. See e.g., *APCC Recon* at n.18 and accompanying text.

(And for those parties, like Sprint (Sprint Opp at 5-6), and USTA (USTA Opp at 2) who complain that APCC restates its position, that is because the opposing parties keep saying the same foolish things, like “there is no proof that low income people use payphones and only payphones targeted to the low income people should even be under discussion.” NASUCA Opp at 3, USTA Opp at 3. Who do they think is using payphones? Do they think people ride an elevator down from their condos, or go park their cars, or interrupt their shopping at the mall, or stop walking to their departure gate, to go use a payphone when they have a smartphone at hand? It is the people who are in the condo to clean it or who live in the apartment house with stairs and no elevator, or who may not have a car, or who are at the mall because it is where they do low wage maintenance work, or who is a low income traveler on a low budget or who work at the airport food stand, who are using the payphones..)

It may or may not be accurate that it is not necessarily low income people *who would qualify for the Commission’s Lifeline program* who would be using payphones. (But there are and will be plenty of low income people who do meet the Commission’s guidelines using payphones as well --if they have access to any service at all. As APCC has pointed out, (*APCC Recon* at 9) the Commission itself recognizes that even if the Commission’s program is 100% successful, there will still be 49% of the eligible low income population not served by the program. What phones are the unserved going to use if not payphones?) But is the Commission going to say it really makes a difference in terms of the universal service objectives *which* low income people are using the payphones? It will clearly be low income people, by definition, since they are the ones who don’t have any other service.

Moreover, it is simply not feasible to demonstrate that the majority of users of payphones are low income people qualifying under the Commission’s criteria. Even if it were otherwise economically feasible to commission a survey worker to stand at enough payphones for enough hours of enough days to get a valid sampling, which of course it is not, the practicalities of approaching each user of the payphone and attempting to get the caller to provide the kind of information necessary to show qualification under the Commission guidelines are insurmountable. Callers are not going to provide that information in the circumstances under which the information would have to be gathered. And even if the survey taker did manage to get the caller to answer the necessary questions, a pretty unlikely outcome, there is no practical way to validate the information. At some point, common sense has to prevail about who is using payphones.

⁴ Nor should there be any confusion here. Despite USTA’s attempts at obfuscation, what APCC is seeking is crystal clear: Lifeline support for payphone line service. USTA introduces a garbled discussion of “affordability” and “high cost.” USTA Opp at 2-3. Lifeline support is a universal service mechanism provided in high cost areas and all other areas. APCC’s proposals are totally unrelated to high cost support.

⁵ The dramatic and accelerating decline in the number of payphones deployed is already in the record. E.g., *Payphone Line Support Rulemaking Petition* at 8-11. APCC notes that based on the data available to it, this trend is continuing and fewer and fewer payphone providers continue as viable business entities.

income people in particular, the Commission is willing to open a rule making to assess and explore whether maintaining payphones through providing Lifeline support to ETCs who provide dial tone to payphones is a necessary complement to the Commission's Lifeline program or whether some other vehicle is appropriate and, in the interim while the issue is explored, provide the support on an interim basis.⁶ In such a rulemaking, the Commission could fully explore the range of options for addressing the gaps in service currently filled by payphones, and how, if it is necessary at all, those gaps will be addressed if payphones are allowed to disappear.

As we demonstrate below, there is not a serious question of legal authority or meeting statutory requirements. Even if there were, the Commission, as it has demonstrated in the case of non-facilities based mobile services providers offering Lifeline service, has ample waiver and forbearance authority. And while the Commission has wide discretion in using the forbearance and waiver tools, that discretion is not unbounded; the Commission cannot exercise its discretion in a manner that leaves a competitively discriminatory scheme in place.

ARGUMENT

The Oppositions have raised only two arguments that have sufficient merit to warrant any lengthy response. In addition, there are a few other points to be made.

⁶ The interim relief would be limited to payphones existing as of the date of the Commission's order granting the relief. Moreover, as APCC has explained, there is no real likelihood that any meaningful number of payphones would be placed as a result of granting interim or permanent relief. *See Payphone Line Support Rulemaking Petition* at n.62. In any event, as part of the rulemaking, the support could be adjusted to cover only those lines that warrant support. No party has questioned the Commission's authority to provide interim relief.

I. MAJORITY OF RESIDENTIAL CUSTOMERS SUBSCRIBING TO A SERVICE

Several of the Oppositions seize upon the requirement of Section 254(c)(1)(B), 47 USC §254(c)(1)(B), of the Act that the Commission “shall consider the extent to which” a service is “subscribed to by a substantial majority of residential customers.” They argue that it is mandatory that a service meet this threshold to be eligible for universal service support.⁷ They are wrong, and they have stood the purpose of Section 254(c)(1)) on its head.

The legislative history makes clear that the Commission has discretion in considering whether to provide universal support for a service not meeting a criterion in Section 254(c)(1).

⁷ See Sprint Opp at 5, Verizon Opp at 3-4. Verizon mistakenly asserts that APCC argued that *because* the Commission had not made a finding that a majority of residential subscribers subscribe to mobile services, it was not necessary for payphone line service to meet this subscription criterion. APCC’s argument is that it is not a necessary precondition to be eligible for universal service support for either mobile service or payphone line service to meet this criterion, as is discussed in the text following this note.

Once it is recognized that it is not necessary for a majority of residential customers to subscribe to a service for the service to be eligible for Lifeline support, Verizon’s two other contentions are irrelevant. APCC nonetheless points out that both are incorrect. Citing *High Cost Universal Support, Federal State Joint Board on Universal Service*, WC Dkt. No. 05-337, CC Dkt. No. 96-45, Recommended Decision, 22 FCC Rcd 20477, 20492, ¶65 (Jt. Bd. 2007), Verizon argues that in fact there has been a finding by the Joint Board that a majority of residential customers do subscribe to mobile services. APCC notes, however, that in fact the Commission, correctly, did not anywhere adopt the Joint Board conclusion that a majority of residential customers subscribe to mobile service. The Joint Board’s finding adopted the fallacious logic that because the number of mobile phones is so high, it must be the case that a majority of residents have subscribed to mobile service. See 22 FCC Rcd 20477. But as APCC pointed out; virtually all people have a residence. The fact that a majority of people who live in residences have subscribed to a service does not mean they have subscribed to the service as a “residential customer.” And in fact the majority of residential customers still have landline service. *APCC Recon* at 12-13. Under the logic adopted by the Joint Board, if a majority of residents subscribed to “On Board” or another vehicle-based mobile emergency/support service, that would meet the criteria of subscription by a majority of residential customers and make the service eligible for universal support services, even though the service has nothing to do with their status as “residential customers.”. Section 254(c)(1)(B) cannot be that open ended. It refers to subscribers who use a service as a residential service, such as wireless subscribers who “have cut the cord.”. Compare Sprint Opp at n.12, arguing that because there are hundreds of millions of wireless subscribers, they are “residential customers.”

Verizon is also incorrect that the Commission said mobile service should not be analyzed differently than other voice services for Section 254(c)(1)(B) purposes. Verizon Opp at 4, citing *Connect America Fund*, WC Dkt. No. 10-9, Report Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17776, ¶309. What the Commission said is that it would allow mobile voice service to be treated as a voice service for purposes of allowing Lifeline support to be applied to bundled packages of voice and data service, and that the data service was not a separate supported service. The Commission made neither a finding that it was necessary for a majority of residential customers to subscribe to mobile services for the Commission to provide support for those services nor that in fact a majority of residential customers do subscribe to mobile services.

The purpose of Section 254 was to require the Commission to make a service eligible for universal service support if it met the criteria contained in Section 254(c)(1) but not to preclude from eligibility for support a service that did not meet all the criteria.

The House version of Section 254(c)(1) enumerated in slightly different order and in slightly different language the four criteria contained in the current statute.⁸ The Committee Report explained that the specific “factors included in subsection (c) are intended to” provide guidance “in walking the fine line between including new services too fast, and risk increasing prices dramatically and ‘gold plating’ the network, and being slow to include the services.”⁹ Thus, the House was concerned about caution being exercised in including new services but did not require the Commission to include or exclude any service in the services eligible for universal support.

The Senate version of the bill took a different approach. It included only one explicit criterion in what became Section 254(c)(1) but required that “At a minimum, universal service shall include any telecommunications services” that have “been subscribed to by a substantial majority of residential customers.”¹⁰ The Committee Report stated that “the subsection requires the FCC to include, at a minimum, any telecommunications service that is subscribed to by a substantial majority of residential customers.”¹¹ Thus the Senate bill intended to make it mandatory for any service meeting the specified criterion to be eligible for universal service, but

⁸ Report of the Committee On Commerce to accompany H.R.1555, Communications Act of 1995, Rept. 104-204, Part I, 104th Congress, 1st Session, at 154 (July 24, 1995) (“House Report”).

⁹ *Id.* 80

¹⁰ Report of the Committee on Commerce, Science, And Transportation on S.652, Telecommunications Competition And Deregulation Act of 1995, S. Rpt.104-23, 104th Congress, 1st Session at 94 (March 30, 1995) (“Senate Report”).

¹¹ Senate Report at 27.

clearly left it open for services not meeting this standard to be eligible for universal support.

In the Conference Report on the legislation, “[t]he House recede[d] to the Senate with modifications.”¹² Although the three additional specific criteria contained in the House bill but not contained in the Senate version of the bill were added to the final legislation, there is no indication of any intent to depart from the Senate approach of requiring a telecommunication service meeting all of the specified criteria to be eligible for universal service support. Indeed the House receded to the Senate approach. At the same time, the Commission is still to consider all the criteria.¹³

From this history, the correct reading of the statute can be discerned: the Commission must include in the definition of universal service a telecommunications service meeting all the criteria of Section 254(c)(1) but may, upon consideration of the specific criteria of Section 254(c)(1), include a service that does not meet all the criteria. Thus the fact that a majority of residential customers have not subscribed to payphone line service is not a bar to the Commission’s including payphone line service in the services eligible for universal support.

In any event, even if this were not the correct reading of the statute, the Commission is free on its own motion to forbear from applying this provision, as it did with the facilities based requirement of Section 214(e) in the case of non-facilities based wireless providers.¹⁴ Certainly the three requirements of Section 10(a) of the Act, 47 U.S.C. §160(a), are met.

¹² Conference Report to accompany S. 652 Telecommunications Act of 1996, Report 104-458, 104th Congress, 2^d Session, at 130 (January 3, 1996) (“Conference Report”).

¹³ *Id.* 131.

¹⁴ *Lifeline Order* at ¶¶368-378.

There is no question but that it is not necessary to enforce the requirement that a substantial majority of residential customers have subscribed to payphone service in order to ensure that the rates, charges practices, classifications or regulations at payphones are just and reasonable and not unjustly or unreasonably discriminatory. The Commission long ago made a determination that payphones face sufficient competition for the market to discipline practices and rates.¹⁵ Payphones continue to be under extreme competitive pressure. Indeed, the wireless carriers who the Commission found face enough competitive pressure from each other to warrant forbearance are also competitors of the payphone providers.

Similarly, there is no question but that forbearing from applying the requirement that a substantial majority of residential customers subscribe to payphone service is not necessary for the protection of consumers. The same forces that support forbearance under Subsection (a)(1) of Section 10 support forbearance under subsection (a)(2) as well. The duty of payphones to allow access to 911 services and free to the caller toll free calling remain in place.

Section 10(a)(3) requires the Commission to find that forbearance is in the public interest. In the course of this determination, the Commission is obliged to consider the effects on competition of forbearance. Forbearing from applying the requirement that a majority of residential customers subscribe to payphone service will benefit competition. Payphones impose market discipline by providing an alternative to prepaid wireless providers who might otherwise charge high rates for excess minutes because payphones allow unlimited local calling for a flat

¹⁵ *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Dkt No. 96-128, 11 FCC Rcd 20541, 20547-51(1996).

rate and offer inexpensive coin paid long distance. Thus, the public interest requirement of the forbearance statute is also satisfied.

While the Commission of course has discretion in administering the Act, that discretion is not unbounded. In the *APCC Recon*, APCC discussed at length that the Commission's grant of Lifeline support to wireless carriers without similar relief for payphone line service violated the Commission's own principle of competitive neutrality.¹⁶ Similarly, the Commission's failure to use its forbearance authority in an even-handed manner could raise issues of the Commission's failure to follow its own guidelines or discriminating in the application of the guidelines. For these reasons, if the Commission determines that Section 254(c)(1) requires a service be subscribed to by a majority of residential customers before it is eligible for universal support, the Commission should on its own motion forbear from applying that provision to payphone line service.

II. THE APPROPRIATE CLASSIFICATION OF PAYPHONE SERVICE PROVIDERS

The Commission was troubled by APCC's proposal to reclassify payphone service providers ("PSP"s) as low income consumers in order to make the payphone line service eligible for Lifeline support.¹⁷ Reclassifying the PSPs into an end user class also had the effect, intended by APCC for all the reasons explained in the *APCC Recon*,¹⁸ of relieving PSPs of the obligation to pass on to callers at payphones the rate reduction passed on to the PSPs by the

¹⁶ *APCC Recon* at 19-22.

¹⁷ Sprint's objection, Sprint Opp at 5, that it would violate the Commission's rules for the Commission to provide Lifeline support to payphone line service because PSPs are not low income consumers is of course circular and begs the question entirely. The whole purpose of the *Payphone Line Support Rulemaking Petition* was to put PSPs in the category of "low income consumers."

¹⁸ *APCC Recon* at 4-11.

ETCs who actually receive the Lifeline support money. The Commission was concerned that the net effect would be to give PSPs a “windfall.”

The *APCC Recon* discussed at length why it is not feasible to pass on the reduction, why passing on the reduction would not result in any additional service to low income consumers or mean they could afford more service, and why it would defeat the purpose of the Lifeline support.¹⁹ We will not repeat that discussion here except to observe that given the low profitability of payphones, the purpose of the Lifeline support would be to preserve universal service by keeping in service payphones that will otherwise soon disappear.

Reclassifying payphone providers as low income consumers seemed the simplest, most direct way to reach these results. In a rulemaking, other ways to reach the result or other classifications could be explored.

The main issue of course is not how to classify payphone providers to reach the desired result. The issue is whether the result is desirable. APCC recognizes that its request requires a different perspective; universal support for a service provider who provides service only to and whose users are virtually all low income consumers. Perhaps there is a better way to go than addressing the classification of payphone providers. But that is the kind of discussion that can best be thrashed out in a rulemaking proceeding.

The opponents do not really rebut APCC’s points except to say that payphones are a dying technology unable to compete (Sprint Opp at 6) or express their view that the money spent on payphone line support would be better spent on more support for wireless. (Verizon Opp at

¹⁹ *Id.*

3.)²⁰ Both miss the point. Support will mean payphones will remain available to serve those low income consumers who, by the Commission's own projections, will not make it on to wireless services or into the Commission's programs. That is a major point of the APCC Petitions. But even if payphones disappear over the next few years because wireless service or the Commission's programs do succeed in reaching all low income consumers, it means the Lifeline support for payphone line service will also disappear, since the payphone usage will stop. But in the meantime, many low income consumers who otherwise would have had no service will have had the benefit of service until wireless or other service became available to them, if it ever does. When seen this way, providing Lifeline support for payphones is practically a no lose proposition for universal service; there will be service if there is a need for it, and that service will go away, along with the support for it, if it is no longer needed.

III. OTHER ISSUES

A. Section 276 Public Interest Payphones

As it did in the earlier phase of this proceeding, NASUCA favors using Section 276(b)(2) of the Communications Act, which provides for the FCC to designate public interest payphones, for dealing with payphones needing support.²¹ There are several difficulties with NASUCA's proposal.

Section 276 was not designed to be a program to provide support to payphones for low income groups. It was designed to fill the gaps in payphone deployment in an otherwise robust, competitive payphone market, as its very language indicates. Public interest payphones have to

²⁰ Verizon observes that "virtually every American" has a mobile phone. Verizon Opp at 3. It ignores the data cited by APCC showing that the penetration of mobile phones among low income consumers continues to lag behind that of the rest of America. See *Payphone Line Support Rulemaking Petition* at 11-13.

²¹ NASUCA Opp at 3-4. Verizon also argues for the use of Section 276(b)(2). Verizon Opp at 3.

be applied for on an individual basis²² and are inadequate to address a broad program like providing service for low income groups.

The very example cited by NASUCA, a program in Maine, illustrates all these points. Before turning to that discussion, APCC does observe that so far as APCC is aware, the Maine program is the only one still existing. There may be an isolated phone or two still supported in a few states, but as far as APCC is aware, Maine's program is the most extensive.²³ And the Maine program illustrates why these Section 276 programs are inadequate to and were not designed to address problems of providing service on a broad basis to low income consumers.

Attachment A is the list of payphones shown on the Maine PUC's web site as currently supported under the Maine program. Even a casual review of the locations makes clear these payphones were placed for reasons having little to do with targeting low income users. At least 26 of the 38 phones listed were in police or fire stations, post offices, schools, or other public buildings. Another 4 are at recreational facilities, which are generally payphones placed to allow children to call for pick up, arrange meeting places, etc. Two additional payphones are at public docks and one is at an "Information Booth." Five appear to be at commercial establishments, and it is unclear why they qualify as public interest payphones. What is clear is that whatever civic purposes these phones are serving, no more than one or two are there because they are to serve the low income.²⁴ Moreover, a telephone inquiry revealed that the contract to provide

²² NASUCA clearly envisions a program administered on a phone by phone basis and a program designed to serve very limited locations. NASUCA Opp at 3-4.

²³ APCC did state in the *APCC Recon*, at 23, that there were no public interest payphone programs in effect. The statement was based on the best information then available to APCC. APCC regrets any inconvenience caused by the statement.

²⁴ Indeed while NASUCA advances several tentative guidelines for public interest payphones its examples of supported payphones are those in "remote stretches of roads, remote transportation pi

some or all the public interest payphones is let periodically, (the current contract runs for two years) and applications for new public interest phones are only entertained to coincide with the letting of the contract. Whether there are any public interest payphones is entirely dependent on renewal of funding by the Maine legislature.

It is plain that programs such as these are inadequate to meet a federal mandate to provide service to low income groups. And as mentioned above, so far as APCC is aware, Maine's program is the only active program. The history of the programs in the states, to which the Commission delegated responsibility and funding, demonstrates that the states had difficulty getting and keeping programs. State commissions couldn't find staff to administer the program. Similarly and equally important, payphone providers, who are small independent businesses, found the costs associated with the application process and the program too high, even when payphone provider companies were larger and could spread overheads.²⁵ Because of these barriers, no more than a handful of payphones were ever supported under these programs. These same barriers would exist if the program were moved to the federal level, as NASUCA seems to suggest.²⁶

Moreover, for public interest payphone programs to support a meaningful number of payphones, funding would become an issue. There is no federal source of funding other than universal service. The Commission realistically probably could not start a new funding program. The universal service program is the only feasible way to get the program done.

In any event, it elevates form over substance to move to the Section 276 route. As

²⁵ This is particularly true since all the major LECs have left the payphone business. The remaining payphone providers are all small businesses.

²⁶ NASUCA Opp at 4.

discussed, there is no question but that payphones today overwhelmingly serve low income consumers and should be embraced in a program designed to ensure universal service. To the extent there are concerns that Lifeline/Low Income is not the correct mechanism, that could be addressed in the rulemaking proceeding.

B. Repetitive Arguments

Several parties also argue that APCC advances no arguments not already advanced in its original petition and rejected by the Commission in the *Lifeline Order*.²⁷ This is incorrect. As APCC points out, many of the concerns raised by the Commission in the *Lifeline Order* could not be anticipated and were not addressed in the earlier phase of this proceeding.²⁸ Moreover, the Commission did not address many of the arguments advanced by APCC in the earlier phase of this proceeding and administrative principles of exhaustion may require APCC to give the Commission an opportunity to address them in order to perfect the record for review.²⁹

CONCLUSION

For the foregoing reasons and the reasons advanced in the *APCC Recon*, the Commission should grant the Petition for Partial Reconsideration, order interim relief, and initiate a

²⁷ *E.g.*, Sprint Opp. 5-6.

²⁸ *See, e.g.*, *APCC Recon* at 4-11. In the course of raising some of these arguments, APCC did repeat some material that was a predicate for the argument.

²⁹ *See, e.g.*, *Washington Association for Television and Children v. FCC*, 712 F. 2d 677 (D.C.Cir.1983).

rulemaking to determine whether to provide and the nature of support to be provided to payphone line service.

Respectfully Submitted,



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ATTACHMENT A

	A	B	C
1	Public Interest Payphone Provider Contact		
2	PIP Location	PIP Address	City
3	Cape Docks	7 Cape Docks Rd	Stockton Springs
4	Consolidated School	53 Lamoine Beach Rd	Lamoine
5	Department of Health & Welfare	103 Texas Avenue	Bangor
6	Fire Station	481 Goodwinâ€™s Mills Rd	Lyman
7	Fire Station #2	3 Lavertu Rd	Madawaska
8	Fire Station #2	7 Belgrade Rd	Mt. Vernon
9	Fraternity Village Gen. Store	12 Main St North	Searsmont
10	Hosmer Field Complex	Lincoln Ave	Rumford
11	Information Booth	Rt 2	Rumford
12	Laundromat	40 Main St	Columbia Falls
13	Nasson Community Ctr	457 Main St	Springvale
14	Palmeter's Store	Main St	Meddybemps
15	Police Department	182 East Main St	Dover-Foxcroft
16	Police Department	7 Minden St	Greenville
17	Police Department	99 Main St	Jay
18	Police Department	200 Rogers Rd Ext	Kittery
19	Post Office	2 Island Ave	Cliff Island
20	Post Office	1 Frenchman Bay	Great Cranberry Island
21	Public Safety Building	16 Main St	Freeport
22	Public Safety Building	Rte 302	Raymond
23	Recreation Facility	235 Billings Rd	Hernon
24	Recreational Ball Field	3025 West River Rd	Sidney
25	Rescue Building	Rte 302	Fryeburg
26	Sandy Point Beach	126 Hershey Retreat Rd	Stockton Springs
27	Snack Shack	Tassel Top Park (Rte 302)	Raymond
28	Town Dock	1 Main St	Little Cranberry Island
29	Town Hall Building	11 Sullivan St	Berwick
30	Town Hall Building	1940 Northfield Rd	Northfield
31	Town Hall Building	180 Main St	South Berwick
32	Town Office	144 Lakeview Rd	Glenburn
33	Town Office	8 Unity Square	Machiasport
34	Town Office	12 Readfield Rd	Manchester
35	Town Office	401 Webbs Mills Rd	Raymond
36	Town Office	2986 Middle Rd	Sidney
37	Town Office	419 Main St	St. Agatha
38	Town Office	3 Larkins Rd	Stetson
39	Winn General Store	985 Rt 2	Winn
40	Wytopitlock School	Rte 171	Wytopitlock